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5 Attorneys for Defendant
 6 FRIT ESCONDIDO PROMENADE, LLC

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8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10

11 LARRY McIVER,) Civil Action No. 08 CV 0132 IEG WMc

12 Plaintiff,)

13 vs.)

JOINT MOTION FOR EXTENSION
OF TIME TO FILE RESPONSIVE
PLEADING

14 TARGET CORPORATION dba)
 TARGET #274; COST PLUS, INC.)
 15 dba COST PLUS WORLD)
 MARKET #145; FRIT)
 16 ESCONDIDO PROMENADE, LLC;)
 LA SALSA, INC. dba LA SALSA)
 17 #93; APPLEBEE'S)
 RESTAURANTS WEST, LLC dba)
 18 APPLEBEE'S NEIGHBORHOOD)
 BAR & GRILL #5711; TOYS 'R' US)
 19 - DELAWARE, INC. dba TOYS 'R')
 US #5633; PARTY CITY)
 20 CORPORATION dba PARTY CITY)
 OF ESCONDIDO #445; INLAND)
 21 WESTERN MDS PORTFOLIO,)
 LLC,)

Hon. Irma E. Gonzalez

22 Defendants.)

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24 Pursuant to CivLR 12.1 of the Local Rules of Practice for United States District

25 Court, Southern District of California, Defendant FRIT Escondido Promenade, LLC

26 ("Defendant") and Plaintiff Larry McIver ("Plaintiff"), hereby jointly move for an order

27 extending the time for Defendant to file its response to Plaintiff's Complaint. The parties


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1 jointly request that the deadline for filing Defendant's First Responsive pleading be
2 extended 30 days, from February 19, 2008 to March 20, 2008.

3 Good cause exists for granting an extension. Defendant has only recently retained
4 counsel, Pillsbury Winthrop Shaw Pittman LLP, and counsel needs time to review the facts
5 and allegations in order to prepare a proper response. The case involves numerous specific
6 allegations regarding ADA accessibility at several large retail stores and restaurants located
7 at a large shopping center, as well as corresponding parking and other common areas.

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9 DATED: February 15, 2008

10 PILLSBURY WINTHROP SHAW PITTMAN LLP

11 By 
12 Stefan Teichert
13 Attorneys for Defendant FRIT ESCONDIDO
14 PROMENADE, LLC

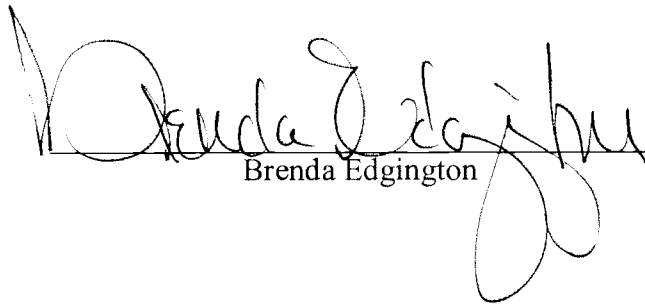
15 DATED: February 15, 2008

16 DISABLED ADVOCACY GROUP, APLC

17 By 
18 Lynn Hubbard, III
19 Attorneys for Plaintiff LARRY McIVER
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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of February, 2008, a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING** was electronically transmitted to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF registered parties in the case.



Brenda Edgington